

OCT 21 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

3. Officers executed a traffic stop at 4200 S. Compton. One officer approached and made contact with the driver, Tommy G., the front seat passenger, Keith W., and the back seat passenger, Demarko Smith. As the driver rolled down the window, a strong odor of marijuana came out of the vehicle. The

occupants were asked for the identification and each complied.

4. Keith W. had an active wanted from the 1st District for Assault 1st. Defendant had two active bench warrants and a prior history was indicated.

5. While Defendant was being detained, one officer observed, in plain view, a "blunt" in the right rear passenger door, which was seized as evidence. A search of the vehicle revealed a black Denali COA .380 handgun under the drivers' seat. In an open red bag in the right rear passenger seat was found a silver Minima GAA .45 caliber handgun and a clear knotted plastic baggie containing a leafy green substance. I was also noticed that while obtaining the pedigree of Defendant, Defendant's left arm was resting over the top of the red bag.

6. Defendant was arrested for Felon in Possession of a Firearm and Possession of Marijuana. Defendant was read his right per Miranda, to which he stated that he understood and made no further statements.

7. Defendant, after one conviction and multiple pleas to felony drug offenses, is found in a vehicle with drugs and two guns. Defendant's continued drug possession and, now with a firearm, poses an increased risk to the community.

8. Defendant's criminal history reflects that he has conviction(s) including, but not limited to, the following:

Date	Court	Case No.	Charge	Sentence
8/15/2011	St. Louis City Circuit	1122-CR00301-01	Poss of CDS	SIS - 2 years probation
8/26/2016	St. Louis County	14SL-CR08946-01	Poss of CDS	4 year SES - 5 years probation
9/28/2018	St. Louis City Circuit	1522-CR04953-01	Poss of CDS x 4	SIS - 1 day probation
9/28/2018	St. Louis City Circuit	1622-CR00609-01	Poss of CDS x 2	SIS - 1 day probation

9. Defendant's criminal history also reflects arrests not resulting in convictions including, but not limited to, the following:

Robbery 1st, Tampering 1st, multiple Possession of a Controlled Substance, Domestic Assault 2nd, Felony Stealing Livestock, Felony Probation Violation, and Felony Failure to Appear

10. Defendant history of drug offenses and arrest, coupled with several violent crimes arrest show he is a risk to the community, especially since the current incident included drugs and a firearm. Further, his history of probation violations and failure to appear are evidence that he is an increased flight risk.

11. Defendant has before been arrested for probation or parole violations. Defendant's inability to comply with the law while on probation and parole is indicative of his danger to the community and risk of flight were he to be released on bond in this case.

12. There is a serious risk that Defendant will flee, given Defendant's history of his failure to comply with supervision while on probation / parole, and the potential sentence Defendant faces in this case.

13. Defendant's criminal history and the nature and circumstances of the offense charged reflect that there is a serious danger to the community that would be posed by Defendant's release. Further, there are no conditions or combination of conditions that will reasonably assure Defendant's appearance as required.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

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